

INTERNATIONAL UNION OF OPERATING : IN THE MONTGOMERY COUNTY
ENGINEERS LOCAL 542 : COURT OF COMMON PLEAS

v.

MALLINCKRODT ARD, INC., formerly :
known as QUESTCOR : No. 2018-14059
PHARMACEUTICALS, INC.

MALLINCKRODT PLC

EXPRESS SCRIPTS HOLDING COMPANY

EXPRESS SCRIPTS, INC.
CURAScript, INC.

CURAScript SD

ACCREDITO HEALTH GROUP, INC.

and

UNITED BIOSOURCE CORPORATION, now :
known as UNITED BIOSOURCE LLC., a :
wholly owned subsidiary of UNITED :
BIOSOURCE HOLDINGS, INC.

OBJECTIONS TO SUBPOENAS PURSUANT TO RULE 4009.21

Defendants Mallinckrodt ARD Inc. and Mallinckrodt plc (collectively, "Mallinckrodt") object to the proposed subpoenas directed to (1) Dr. Irene Greenhouse, M.D.; (2) Dr. Gary W. Clauser, M.D.; and (3) Dr. Steven Urbaniak, D.O. (collectively, the "Physician Subpoenas") that are attached collectively as Exhibit "A" to these objections for the following reasons:

1. The three identical Physician Subpoenas – which seek documents far outside the permissible bounds of discovery, as detailed further herein – are designed to cause, and would cause, unreasonable annoyance, embarrassment, and burden as they improperly seek the personal health information for an unknown number of individuals who are entirely unrelated to Plaintiff and its claims against Defendants.

2. The Physician Subpoenas also will improperly harass and annoy these non-party physicians and cause them cause unreasonable burden and harm Mallinckrodt's relationship with the prescribing physicians, thus potentially impacting Mallinckrodt's business.

3. The Physician Subpoenas also will improperly cause embarrassment to these non-party physicians and interfere with the patient-physician relationship by insinuating that an unapproved or off-label use of Acthar would be inappropriate when, to the contrary, a physician is well within his or her right to prescribe Acthar based on his or her expert knowledge, treatment experience, and patient response.

4. The Physician Subpoenas further cause unreasonable annoyance and burden as they are not appropriately limited in time or scope, amounting to an untargeted fishing expedition in the files of these non-parties.

5. The Physician Subpoenas further improperly seek information that is in the possession of Mallinckrodt or other Defendants and is thus readily available to Plaintiff through regular discovery requests without needlessly harassing and burdening the uninvolved non-parties.

6. The Physician Subpoenas are beyond the scope of permissible discovery set forth in Rule 4003.1 in that they are not reasonably calculated to lead to the discovery of admissible evidence and improperly seek production of documents not remotely relevant to this lawsuit. For example, and without limitation, the Physician Subpoenas seek information relating to:

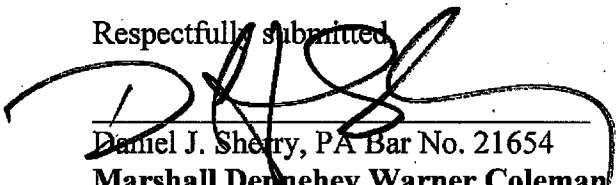
- Acthar prescriptions for multiple sclerosis, despite multiple sclerosis being mentioned only once in the Amended Complaint (¶ 154) and not remotely connected to the four patients that Plaintiff International Union of Operating Engineers Local 542 ("Plaintiff") insures;

- Off-label treatments and unapproved uses and doses, despite no mention of unapproved dosing and a single allegation (§ 45) relating to off-label treatment for infantile spasms, which clearly does not relate to Plaintiff's adult patients;
- Physician-attended meetings and educational seminars, despite no alleged conduct relating to such meetings;
- Mallinckrodt's relationship with the three physicians, despite the Amended Complaint naming none of these physicians nor alleging that these physicians treated the patients at issue in the suit or that Mallinckrodt (or any other Defendant for that matter) had an improper relationship with the physicians;
- The three physicians' relationship and dealing with Acthar and *any* patients, despite only four patients being associated with Plaintiff and mentioned in the Amended Complaint none of which are alleged to have been treated by these physicians; and
- Mallinckrodt sales representatives, despite allegations in the Amended Complaint stating that "all aspects of Acthar distribution and sales were handled by Express Scripts" (§§ 50, 169).

WHEREFORE, Defendants Mallinckrodt ARD Inc. and Mallinckrodt plc object to Plaintiff's proposed subpoenas directed to (1) Irene Greenhouse, M.D.; (2) Gary W. Clauser, M.D.; and (3) Steven Urbaniak, D.O. and respectfully request that the Court sustain their objections, preclude Plaintiff International Union of Operating Engineers Local 542 from issuing the proposed subpoenas, and grant such other and further relief as the Court deems appropriate.

Date: July 25, 2019

Respectfully submitted,



Daniel J. Sherry, PA Bar No. 21654

**Marshall Dennehey Warner Coleman
& Goggin**

620 Freedom Business Center, Suite 300

King of Prussia, PA 19406

DJSherry@MDWCG.com

G. Patrick Watson (*pro hac vice*)

Lindsay Sklar Johnson (*pro hac vice*)

Bryan Cave Leighton Paisner LLP

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1201 W. Peachtree St., NW

Atlanta, GA 30309

(404) 572-6600

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lindsay.johnson@bclplaw.com

Herbert R. Giorgio, Jr. (*pro hac vice*)

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One Metropolitan Square

211 North Broadway, Suite 3600

St. Louis, MO 63102

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herb.giorgio@bclplaw.com

Philip D. Bartz (*pro hac vice*)
Bryan Cave Leighton Paisner LLP
1155 F Street, N.W.
Washington, DC 20004
(202) 508-6000
philip.bartz@bclplaw.com

*Counsel for Mallinckrodt ARD Inc. and
Mallinckrodt plc*

CERTIFICATE OF SERVICE

Daniel J. Sherry, Esquire hereby certifies that a true and correct copy of the foregoing Objections To Subpoenas Pursuant To Rule 4009.21 was electronically filed and forwarded to the following via email and/or United States First Class Mail, postage prepaid, on July 25, 2019:

G. Patrick Watson, Esquire
Lindsay Sklar Johnson, Esquire
Bryan Cave Leighton Paisner LLP
One Atlantic Center, 14th Floor
1201 W. Peachtree Street, NW
Atlanta, GA 30309

(Also sent via email as follows:
patrick.watson@bclplaw.com
lindsay.johnson@bclplaw.com)

Philip D. Bartz, Esquire
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Matthew M. Martino, Esquire
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Evan R. Kreiner, Esquire
Skadden, Arps, Slate, Meagher & Flom LLP
four Times Square
New York, NY 10036

(Also sent via email as follows:
matthew.martino@skadden.com
michael.menitove@skadden.com
evan.kreiner@skadden.com)

Herbert R. Giorgio, Jr., Esquire
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One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, MO 73102

(Also sent via email as follows:
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Joseph P. Walsh, Esquire
Walsh Pancio, LLC
2028 North Broad Street
Lansdale, PA 19446
joe@walshpancio.com

Donald E. Haviland, Jr., Esquire
William H. Platt, II, Esquire
Haviland Hughes
201 South Maple Way, Suite 110
Ambler, PA 19002

(Also sent via email as follows:
haviland@havilandhughes.com
platt@havilandhughes.com)

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

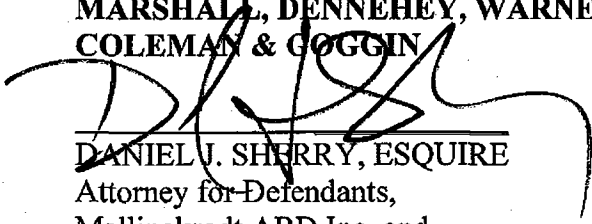

DANIEL J. SHERRY, ESQUIRE
Attorney for Defendants,
Mallinckrodt ARD Inc. and
Mallinckrodt plc

EXHIBIT “A”

Donald E. Haviland, Jr., Esquire (PA I.D. #66615)

haviland@havilandhughes.com

William H. Platt II, Esquire (PA I.D. #83585)

platt@havilandhughes.com

HAVILAND HUGHES

201 South Maple Way, Suite 110

Ambler, PA 19002

(215) 609-4661 Telephone

(215) 392-4400 Facsimile

Counsel for Plaintiff,

International Union of Operating Engineers

Local 542

**IN THE COURT OF COMMON PLEAS
FOR MONTGOMERY COUNTY, PENNSYLVANIA**

**INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 542**

Plaintiff,

v.

MALLINCKRODT ARD, INC., et al.

Defendants.

Civil Action No. 2018-14059

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY
PURSUANT TO RULE 4009.21**

Plaintiff intends to serve a subpoena identical to the one that is attached to this notice.

You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

Respectfully submitted,

Dated: July 11, 2019

By: *s/ Donald E. Haviland, Jr.*

Donald E. Haviland, Jr.

haviland@havilandhughes.com

William H. Platt II

platt@havilandhughes.com

HAVILAND HUGHES

201 South Maple Avenue, Suite 110

Ambler, PA 19002
Phone: (215) 609-4661
Fax: (215) 392-4400

*Counsel for Plaintiff,
International Union of Operating
Engineers Local 542*

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haviland@havilandhughes.com

William H. Platt II, Esquire (PA I.D. #83585)

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Local 542

**INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 542**

Plaintiff,

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MALLINCKRODT ARD, INC., et al.

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CERTIFICATE OF SERVICE

I, Donald E. Haviland, Jr. hereby certify that on this 11th day of July, 2019, a true and correct copy of the attached Notice of Intent to Serve Subpoena was served upon the following parties via electronic mail and first-class mail as follows:

G. Patrick Watson, Esquire
Lindsay Sklar Johnson, Esquire
Bryan Cave Leighton Paisner, LLP
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Michael Menitove, Esquire
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New York, NY 10036-6522
Matthew.Martino@skadden.com
Evan.Kreiner@skadden.com
Michael.Menitove@skadden.com

s/ Donald E. Haviland, Jr.
Donald E. Haviland, Jr., Esq.

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY

International Union of Operating :
 Enginners Local 542, :
 Plaintiff :

v.

: File No. 2018-14059

Mallinckrodt ARD, INC., et al, :
 Defendants. :

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
 FOR DISCOVERY PURSUANT TO RULE 4009.21**

TO: Steven Urbaniak, D.O. 940 Town Center Dr., Suite F50,
 (Name of Person or Entity) Langhorne, PA 19047

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

See Attachment "A".

at Haviland Hughes, 201 S. Maple Way, Suite 100, Ambler PA 19002
 (address)

You may deliver or mail legible copies of the documents or produce things requested by the subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Donald E. Haviland, Jr., Esq.

ADDRESS: 201 S. Maple Way, Suite 100

Ambler, PA 19002

TELEPHONE: 215-609-4661

SUPREME COURT ID#: 66615

ATTORNEY FOR: Plaintiff, IUOE Local 542

BY THE COURT:

Mark Levy, Prothonotary

DATE: _____

Seal of the Court

BY: 

Agent/Deputy

RETURN OF SERVICE:

On the _____ day of _____, 20____,

I, _____,

served _____
(NAME OF PLACE SERVED)

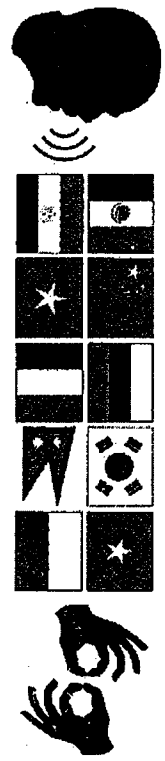
with the foregoing subpoena by:
(Describe method of service)

I verify that the statements in this return of service are true and correct. I understand that false statements herein are made subject to the penalties of 18Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

DATE: _____

(SIGNATURE)

Notice of Language Rights



FREE INTERPRETER

PO Box 311 Northtown, PA 19404
languageaccesscoordinator@montcopa.org
610-278-3231
www.dacourts.us/language-rights

Spanish/Español: Usted tiene derecho a un intérprete libre de costo. Para solicitar un intérprete favor de informárselo al personal judicial utilizando la información provista en la parte superior de este aviso.

Russian/Русский: У вас есть право на бесплатные услуги переводчика. Заявка на переводчика подается в суд по адресу, телефону или эл. почте, указанным выше в заголовке этого уведомления.

Mandarin/Cantonese Simplified Chinese/普通话/粵語簡體中文: 您有权获得免费的口译员服务。若需要口译员，请使用本通知上方提供的联系信息通知法院工作人员。

Arabic/العربية: إعلام موظفي المحكمة باستخدام معلومات الاتصال المقدمة في الجزء العلوي من هذا الإشعار. يرجى ذلك للحصول على مترجم دون أي تكلفة من مكتب طلب جانيك. www.dacourts.us/language-rights

Korean/한국어: 귀하를 비용에 대한 부담 없이 통역 서비스를 받을 권리가 있습니다. 통역 서비스를 요청하려면 본 통지서의 상단에

ATTACHMENT "A"

Please produce the following documents:

1. All documents referring or relating to any meetings and communications between You and Mallinckrodt.
2. All documents referring or relating to meetings and communications between You and United BioSource.
3. All documents referring, relating to or reflecting Your prescriptions of Acthar to patients with MS.
4. All documents referring, relating to or reflecting Acthar treatment for unapproved uses and doses, such as 5-day dosing for multiple sclerosis.
5. All documents referring, relating to or reflecting Acthar off label treatments.
6. All documents shared between You and any Person concerning the Acthar Support & Access Program ("ASAP").
7. All Acthar Start Forms relating to Your prescriptions of Acthar.
8. All documents related to meetings and communications between You and any other doctor(s) regarding Acthar.
9. All documents referring, relating to or received during continuing medical education (CME) seminars or meetings during which Acthar treatment was discussed.
10. All documentation concerning payments for consulting or speaking engagements by Mallinckrodt.
11. All contracts or agreements between You and Mallinckrodt.
12. All documents referring or relating to reimbursements or payments for trips, travel, meals and entertainment from Mallinckrodt to You.
13. Any and all documents referring, relating to or reflecting of any payments, gifts or things of value to You from Mallinckrodt.
14. All Your tax returns reflecting on money paid by Mallinckrodt to You.
15. All documents relating to meetings and communications with Mallinckrodt sales representatives, including Stacyann Clancy and Art Veno.

16. All documents provided to You, discussed, or generated during the meeting with Dr. Gunawardane on January 8, 2013, including notes.
17. All studies conducted by You concerning Acthar or ACTH, including all supporting materials therefor.

HAVILAND HUGHES

BY: s/Donald E. Haviland, Jr.
Donald E. Haviland, Jr.

Donald E. Haviland, Jr., Esquire (PA I.D. #66615)

haviland@havilandhughes.com

William H. Platt II, Esquire (PA I.D. #83585)

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HAVILAND HUGHES

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(215) 609-4661 Telephone

(215) 392-4400 Facsimile

Counsel for Plaintiff,

International Union of Operating Engineers

Local 542

**IN THE COURT OF COMMON PLEAS
FOR MONTGOMERY COUNTY, PENNSYLVANIA**

**INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 542**

Plaintiff,

v.

MALLINCKRODT ARD, INC., *et al.*

Defendants.

Civil Action No. 2018-14059

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Dated: July 11, 2019

By: *s/ Donald E. Haviland, Jr.*

Donald E. Haviland, Jr.

haviland@havilandhughes.com

William H. Platt II

platt@havilandhughes.com

HAVILAND HUGHES

201 South Maple Avenue, Suite 110

Ambler, PA 19002
Phone: (215) 609-4661
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*Counsel for Plaintiff,
International Union of Operating
Engineers Local 542*

Donald E. Haviland, Jr., Esquire (PA I.D. #66615)

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William H. Platt II, Esquire (PA I.D. #83585)

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(215) 609-4661 Telephone

(215) 392-4400 Facsimile

Counsel for Plaintiff,

International Union of Operating Engineers

Local 542

**INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 542**

Plaintiff,

v.

MALLINCKRODT ARD, INC., et al.

Defendants.

Civil Action No. 2018-14059

CERTIFICATE OF SERVICE

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Bryan Cave Leighton Paisner, LLP
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1201 W. Peachtree Street, NW
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Four Times Square
New York, NY 10036-6522
Matthew.Martino@skadden.com
Evan.Kreiner@skadden.com
Michael.Menitove@skadden.com

s/ Donald E. Haviland, Jr.
Donald E. Haviland, Jr., Esq.

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY

International Union of Operating
Engineers Local 542,
Plaintiff,

v.

File No. 2018-14059

Mallinckrodt ARD, Inc., et al.

Defendants.

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.21**

TO: Gary W. Clauser, M.D. 1250 S. Cedar Crest Blvd., Suite 405
(Name of Person or Entity) Allentown, PA 18103

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

See Attachment "A".

at Haviland Hughes, 201 S. Maple Way, Suite 100, Ambler, PA 19002
(address)

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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Donald E. Haviland, Jr., Esq.

ADDRESS: 201 S. Maple Way, Suite 100
Ambler, PA 19002

TELEPHONE: 215-609-4661

SUPREME COURT ID#: 66615

ATTORNEY FOR: Plaintiff, IUOE Local 542

BY THE COURT:

Mark Levy, Prothonotary

DATE: _____

Seal of the Court

BY: 

Agent/Deputy

RETURN OF SERVICE:

On the _____ day of _____, 20____,

I, _____
served _____
(NAME OF PLACE SERVED)

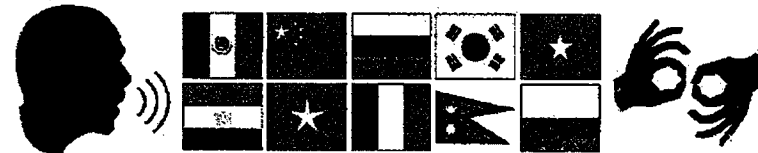
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(Describe method of service)

I verify that the statements in this return of service are true and correct. I understand that false statements herein are made subject to the penalties of 18Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

DATE: _____

(SIGNATURE)

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Russian/Русский: У вас есть право на бесплатные услуги переводчика. Заявка на переводчика подается в суд по адресу, телефону или эл. почте, указанным выше в заголовке этого уведомления.

Mandarin/Cantonese Simplified Chinese/普通话/粤语简体中文: 您有权获得免费的口译员服务。若需要口译员，请使用本通知上方提供的联系信息通知法院工作人员。

العربية/Arabic: إعلام موظفي المحكمة باستخدام معلومات الاتصال المقدمة في الجزء العلوي من هذا الإشعار. يحق لك الحصول على مترجم دون دفع أي تكلفة من جانبك. لطلب مترجم، يرجى

Korean/한국어: 귀하는 비용에 대한 부담 없이 통역 서비스를 받을 권리가 있습니다. 통역 서비스를 요청하려면 본 통지서의 상단에

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Defendants.

Civil Action No. 2018-14059

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY
PURSUANT TO RULE 4009.21**

Plaintiff intends to serve a subpoena identical to the one that is attached to this notice.

You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

Respectfully submitted,

Dated: July 11, 2019

By: s/ Donald E. Haviland, Jr.

Donald E. Haviland, Jr.

haviland@havilandhughes.com

William H. Platt II

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HAVILAND HUGHES

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*Counsel for Plaintiff,
International Union of Operating
Engineers Local 542*

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Counsel for Plaintiff,

International Union of Operating Engineers

Local 542

**INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 542**

Plaintiff,

v.

MALLINCKRODT ARD, INC., et al.

Defendants.

Civil Action No. 2018-14059

CERTIFICATE OF SERVICE

I, Donald E. Haviland, Jr. hereby certify that on this 11th day of July, 2019, a true and correct copy of the attached Notice of Intent to Serve Subpoena was served upon the following parties via electronic mail and first-class mail as follows:

G. Patrick Watson, Esquire
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s/ Donald E. Haviland, Jr.
Donald E. Haviland, Jr., Esq.

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY

International Union of
Operating Engineers Local 542

v.

: File No. 2018-14059

Mallinckrodt ARD, Inc. et al.

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.21TO: Irene Greenhouse, M.D., 2370 York Rd., Suite C3,
(Name of Person or Entity) Jamison, PA 18929

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

See Attachment "A"at Haviland Hughes, 201 S. Maple Way, Suite 100 Ambler, PA 19002
(address)

You may deliver or mail legible copies of the documents or produce things requested by the subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Donald E. Haviland, Jr., Esq.ADDRESS: 201 S. Maple Way, Suite 110
Ambler, PA 19002TELEPHONE: 215-609-4661SUPREME COURT ID#: 66615ATTORNEY FOR: Plaintiff, IUOE Local 542

BY THE COURT:

Mark Levy, Prothonotary

DATE: _____

Seal of the Court

BY: 

Agent/Deputy

RETURN OF SERVICE:

On the _____ day of _____, 20____,

I, _____

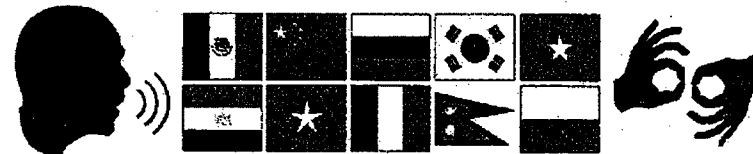
served _____
(NAME OF PLACE SERVED)

with the foregoing subpoena by:
(Describe method of service)

I verify that the statements in this return of service are true and correct. I understand that false statements herein are made subject to the penalties of 18Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

DATE: _____

(SIGNATURE)

Notice of Language Rights**FREE INTERPRETER**

PO Box 311 Norristown, PA 19404
languageaccesscoordinator@montcopa.org
610-278-3231
www.pacourts.us/language-rights

Spanish/Español: Usted tiene derecho a un intérprete libre de costo. Para solicitar un intérprete favor de informárselo al personal judicial utilizando la información provista en la parte superior de este aviso.

Russian/Русский: У вас есть право на бесплатные услуги переводчика. Заявка на переводчика подается в суд по адресу, телефону или эл. почте, указанным выше в заголовке этого уведомления.

Mandarin/Cantonese Simplified Chinese/普通话/粤语简体中文: 您有权获得免费的口译员服务。若需要口译员, 请使用本通知上方提供的联系信息通知法院工作人员。

العربية/Arabic: إعلام موظفي المحكمة باستخدام معلومات الاتصال المقدمة في الجزء العلوي من هذا الإشعار. يحق لك الحصول على مترجم دون دفع أي تكلفة من جانبك. لطلب مترجم، يرجى

Korean/한국어: 귀하는 비용에 대한 부담 없이 통역 서비스를 받을 권리가 있습니다. 통역 서비스를 요청하려면 본 통지서의 상단에

ATTACHMENT "A"

Please produce the following documents:

1. All documents referring or relating to any meetings and communications between You and Mallinckrodt.
2. All documents referring or relating to meetings and communications between You and United BioSource.
3. All documents referring, relating to or reflecting Your prescriptions of Acthar to patients with MS.
4. All documents referring, relating to or reflecting Acthar treatment for unapproved uses and doses, such as 5-day dosing for multiple sclerosis.
5. All documents referring, relating to or reflecting Acthar off label treatments.
6. All documents shared between You and any Person concerning the Acthar Support & Access Program ("ASAP").
7. All Acthar Start Forms relating to Your prescriptions of Acthar.
8. All documents related to meetings and communications between You and any other doctor(s) regarding Acthar.
9. All documents referring, relating to or received during continuing medical education (CME) seminars or meetings during which Acthar treatment was discussed.
10. All documentation concerning payments for consulting or speaking engagements by Mallinckrodt.
11. All contracts or agreements between You and Mallinckrodt.
12. All documents referring or relating to reimbursements or payments for trips, travel, meals and entertainment from Mallinckrodt to You.
13. Any and all documents referring, relating to or reflecting of any payments, gifts or things of value to You from Mallinckrodt.
14. All Your tax returns reflecting on money paid by Mallinckrodt to You.
15. All documents relating to meetings and communications with Mallinckrodt sales representatives, including Stacyann Clancy and Art Veno.

16. All documents provided to You, discussed, or generated during any meeting with Dr. Gunawardane, including notes.
17. All studies conducted by You concerning Acthar or ACTH, including all supporting materials therefor.

HAVILAND HUGHES

BY: s/Donald E. Haviland, Jr.
Donald E. Haviland, Jr.